

Patrick J. Reilly, Esq.
Nevada Bar No. 6103
Monique S. Jammer, Esq.
Nevada Bar No. 15420
BROWNSTEIN HYATT FARBER SCHRECK, LLP
100 North City Parkway, Suite 1600
Las Vegas, Nevada 89106
Telephone: 702.382.2101
Facsimile: 702.382.8135
preilly@bhfs.com
mjammer@bhfs.com

Attorneys for American Education Services, LLC

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

RICHARD KLEIN, RAYMOND URIAS, and
SARA J. GUNTER, individually and on behalf
of all others similarly situated,

Plaintiffs,

v.

NATIONAL COLLEGIATE STUDENT
LOAN TRUST 2005-3; NATIONAL
COLLEGIATE STUDENT LOAN TRUST
2006-3; NATIONAL COLLEGIATE
STUDENT LOAN TRUST 2007-1;
NATIONAL COLLEGIATE STUDENT
LOAN TRUST 2007-2; NATIONAL
COLLEGIATE STUDENT LOAN TRUST
2007-3; NATIONAL COLLEGIATE
STUDENT LOAN TRUST 2007-4;
PENNSYLVANIA HIGH EDUCATION
ASSISTANCE AGENCY d/b/a AMERICAN
EDUCATION SERVICES; and
TRANSWORLD SYSTEMS, INC.,

Defendants.

Case No. 2:22-cv-01392-GMN-BNW

**STIPULATION TO AND PROPOSED
ORDER EXTEND DEADLINE TO
RESPOND TO PLAINTIFFS' FIRST
AMENDED COMPLAINT**

(FIRST REQUEST)

STIPULATION

Plaintiffs Richard Klein, Raymond Urias, and Sara J. Gunter ("Plaintiffs"), and Defendant American Education Services, LLC ("AES"), by and through their undersigned counsel, hereby stipulate and agree as follows:

1. On December 23, 2022, Plaintiffs filed their First Amended Complaint (the
25135473.2

“Amended Complaint”). ECF No. 20.

2. On December 29, 2022, Plaintiff served the Summons and Amended Complaint on AES. ECF No. 24.

3. The deadline to respond to the Amended Complaint was originally set for January 19, 2023.

4. AES promptly pursued counsel and just recently retained the undersigned counsel for this action.

5. AES’s inability to clear conflicts and retain the undersigned counsel until recently constitutes excusable neglect for AES not filing its response to the Amended Complaint by the original deadline.

6. Plaintiffs have agreed to grant an extension for AES to respond to the Amended Complaint.

7. The Parties have agreed that AES shall have until February 6, 2023 to answer or otherwise plead in response to the Amended Complaint.

8. This is the first requested extension by AES.

9. No previous extensions have been sought by AES or granted for AES, and no further requests are expected.

10. This stipulation is brought in good faith by all parties and not for purposes of delay.

DATED this 24th day of January, 2023.

DATED this 24th day of January, 2023.

/s/ Patrick J. Reilly
Patrick J. Reilly, Esq.
Monique S. Jammer, Esq.
BROWNSTEIN HYATT FARBER
SCHRECK, LLP

/s/ Gerardo Avalos
George Haines, Esq.
Gerardo Avalos, Esq.
FREEDOM LAW FIRM


*Attorneys for American Education Services,
LLC*

Attorneys for Plaintiffs and the Class

ORDER

IT IS SO ORDERED

DATED: 1:43 pm, January 25, 2023



BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE

25135473.2